

AUSA: Kathryn Boyles

Telephone: (313) 226-9556

AO 91 (Rev. 11/11) Criminal Complaint

Officer:

Jacob Dollar

Telephone: (216) 904-7238

UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Danut Valentin URSEIU

Case No.

Case: 2:24-mj-30224

Assigned To : Unassigned

Assign. Date : 6/10/2024

Description: COMP USA V. URSEIU
(KB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

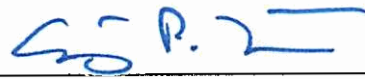
On or about the date(s) of May 17, 2024 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

Title 8 U.S.C. Sec. 1326(a)

Illegal Reentry After Removal

This criminal complaint is based on these facts:

On or about May 17, 2024, in the Eastern District of Michigan, Southern Division, Danut Valentin URSEIU, a citizen and national of Romania, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about May 31, 2023 at Chicago, Illinois, and not having received the express consent or permission of the Attorney General of the United States or the Secretary of the Department of Homeland Security, to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: 06/10/2024City and state: Detroit, Michigan*Complainant's signature*Jacob Dollar, Deportation Officer*Printed name and title**Judge's signature*Hon. Anthony P. Patti, United States Magistrate Judge*Printed name and title*

AFFIDAVIT

I, Jacob Dollar, declare the following under penalty of perjury:

1. I am a Deportation Officer employed with Immigration and Customs Enforcement (ICE), Enforcement and Removal Operations (ERO), of the United States Department of Homeland Security (DHS). I have been employed in this capacity since December 2023. I am assigned to the Criminal Apprehension Program (CAP) in the ICE ERO Detroit Field Office.
2. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include ICE ERO Deportation Officers and record checks of law enforcement databases. I have also reviewed records from the official immigration file and system automated data relating to Danut Valentin URSEIU, which reveals the following:
3. URSEIU is a thirty-one-year-old native and citizen of Romania who last entered the United States at or near an unknown place, on or about an unknown date without being inspected and admitted or paroled by an immigration officer.
4. On or about January 23, 2023, URSEIU was encountered by Border Patrol Agents from United States Customs and Border Protection (CBP) at or near San Ysidro, California. During the encounter, URSEIU admitted that he was a citizen and national of Romania without proper immigration documents to allow him to enter or remain in the United States legally, and that he was not inspected by an immigration officer at a designated port-of-entry.
5. URSEIU was processed for immigration removal proceedings and served with a Notice to Appear (NTA). URSEIU was released on San Diego S-Site Alternative to Detention Program with Smartlink.
6. On or about March 24, 2023, the Monroe County Sheriff's Office in Henrietta, New York arrested URSEIU for Criminal Mischief – 3rd Degree, in violation of PL §145.05.02; Criminal Possession of a Forged Instrument – 2nd Degree, in violation of PL §170.25; Unlawful Possession of a Skimmer Device – 2nd Degree, in violation of PL §190.85; and Conspiracy – 5th Degree, in violation of PL §105.05.

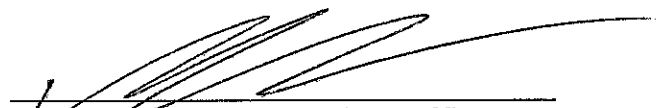
7. On or about March 25, 2023, URSEIU was arraigned at the Henrietta, New York Town Court and released on his own recognizance. The same day, ICE ERO Deportation Officers arrested URSEIU at the Monroe County Sheriff's Office in Henrietta, New York and transferred him to Buffalo Federal Detention Facility.
8. On or about May 4, 2023, URSEIU appeared before an immigration judge at the Batavia, New York immigration court. The immigration judge denied URSEIU's request for pre-conclusion voluntary departure under Immigration and Nationality Act § 240B(a) and ordered URSEIU removed to Romania.
9. On or about May 31, 2023, URSEIU was removed from the United States to Romania through Chicago, Illinois O'Hare International Airport (ORD).
10. Records checks indicate that URSEIU has an active warrant from the Monroe County Sheriff's Office in Henrietta, New York.
11. On or about February 7, 2024, URSEIU was arrested by the Royal Oak, Michigan Police Department and charged with multiple counts of Identity Theft, Possession of a Fraudulent Financial Transaction Device, Use of a Financial Transaction Device to Steal Without Consent, and Police – Assaulting / Resisting / Obstructing.
12. On or about April 2, 2024, the 6th Circuit Court in Pontiac, Michigan convicted URSEIU, by guilty plea, to three counts of Identity Theft, in violation of MCL § 445.65; three counts of Possession of a Fraudulent Financial Transaction Device, in violation of MCL § 750.157n(2); three counts of Use of a Financial Transaction Device to Steal Without Consent, in violation of MCL § 750.157n(1); and one count of Police – Assaulting / Resisting / Obstructing, in violation of MCL § 750.81d(6).
13. On or about May 7, 2024, the 6th Circuit Court in Pontiac, Michigan sentenced URSEIU to 122 days in jail with credit for 91 days served.
14. On or about May 17, 2024, ICE ERO in Detroit, Michigan, arrested URSEIU. Detroit ICE ERO served URSEIU with a Form I-871, Notice of

Intent/Decision to Reinstate Prior Order. The arrest and subsequent detention of URSEIU was an administrative non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States who is reasonably believed to be in violation of any law or regulation regulating the admission, expulsion, or removal of aliens.

15. Fingerprint checks confirmed a positive match for Danut Valentin URSEIU, DOB: XX/XX/1993, a previously removed alien.


16. A review of immigration records (AXXX XXX 761) for URSEIU and queries in the U.S. Department of Homeland Security databases revealed that no record exists of URSEIU obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his removal from the United States to Romania on May 31, 2023.

17. Based on the above information, I believe there is probable cause to conclude that Danut Valentin URSEIU is an alien who, after having been removed from the United States on or about May 31, 2023, was thereafter found in the United States without having obtained the express consent or permission from the Attorney General of the United States or from the Secretary of the Department of Homeland Security to re-apply for admission to the United States, in violation of Title 8, United States Code, Section 1326(a).



Jacob Dollar, Deportation Officer
Enforcement and Removal Operations
Immigration and Customs Enforcement
U.S. Department of Homeland Security

Subscribed and sworn to before me in my
presence and/or by reliable electronic means.



Honorable Anthony P. Patti
United States Magistrate Judge

Dated: June 10, 2024